

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

JOBBIE FLOWERS,

Plaintiff,

v.

ELECTROLUX NORTH AMERICA, INC.,

Defendant.

Civil Action No. 3:20-CV-517-RJC-DCK

Declaration of Brenda Simpson

I, Brenda Simpson, state that the facts set forth below are true and correct to the best of my knowledge, information, and belief, and if called to do so, could testify truthfully thereto:

1. In 2019, I was employed by Electrolux North America, Inc. as Director of IT Operations, and after February 2019, as Senior Director of IT Operations and Service Delivery.

2. During this time, Kopal Rawat held the position of Application Development and Support Manager and reported directly to me. Jobbie Flowers held the position of “Team Lead, Application Support” and reported directly to Rawat.

3. During 2017 and 2018, when I was Flowers’ direct manager, I frequently observed problems with Flowers’ work performance. Specifically, Flowers failed to keep me informed of what he was working on. He often worked on tasks in a different order than I had instructed and failed to complete tasks within the assigned deadline. This would result in work projects not being completed on time. These issues were distinct from problems with Flowers’ behavior that I observed during this time (which included him expressing frustration when being questioned about his work, raising his voice, and speaking in a negative, sarcastic tone with fellow team members).

4. The problems with both Flowers' behavior and his work performance that Rawat reported to me during 2019 and early 2020 were consistent with the problems I personally observed when I was Flowers' direct manager.

5. Naomi Sinclair, Kopal Rawat, and I collectively made the decision to terminate Flowers employment on January 22, 2020. If one of the three of us had disagreed with the other two regarding that decision, Flowers' employment would not have been terminated at that time.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 25, 2021.

A handwritten signature in black ink that reads "Brenda Simpson". The signature is written in a cursive, flowing style. Below the signature is a solid horizontal line.

Brenda Simpson